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2008 SEP 30 PM 1:00

September 29, 2008

Ms. Thomasenia P. Duncan, Esq.
General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

MUR #

6085

2008 SEP 30 P 2:44

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Re: Complaint against Illinois Victory 2008

Dear Ms. Duncan:

Pursuant to 2 USC § 437g(a)(1) and 11 CFR § 111.4, please accept this letter as a Complaint against Illinois Victory 2008. The facts in this matter indicate that Illinois Victory 2008 is operating in violation of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Federal Election Commission ("Commission") regulations by failing to adequately itemize payments apparently made to staff and/or consultants working for the Committee.

Illinois Victory 2008 professes to be a "county party committee" that is "financially and operationally independent" from the Illinois Democratic State Party. See letter to Commission dated May 21, 2008. Upon information and belief, over the last several months, the Committee has spent substantial amounts of money on various get-out-the-vote activities on behalf of Democratic 10th Congressional Candidate Dan Seals, and it has been working closely with the Seals campaign to accomplish their mutual goals. See, e.g., Attachment A.

Since June 2008, Illinois Victory 2008 has been purposely obstructing the number of staffers it is employing, the identity of those staffers, and the amount those staffers are being paid by failing to properly itemize salary payments and instead showing lump-sum payments to "Quickbooks Payroll Service." Such payments were made on the following dates in the following amounts:

| DATE | AMOUNT |
|---------|-------------|
| 6/13/08 | \$ 2,532.74 |
| 7/08/08 | \$ 8,727.76 |
| 7/14/08 | \$ 8,482.78 |

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| DATE (Cont) | AMOUNT (Cont) |
|---------------|---------------------|
| 7/14/08 | \$ 4,481.01 |
| 7/21/08 | \$ 5,312.15 |
| 7/29/08 | \$ 871.85 |
| 7/30/08 | \$ 20,998.30 |
| 8/01/08 | \$ 4,261.53 |
| 8/14/08 | \$ 43,659.14 |
| 8/14/08 | \$ 1,597.87 |
| 8/18/08 | \$ 1,597.87 |
| 8/18/08 | \$ 983.25 |
| 8/19/08 | \$ 589.74 |
| 8/21/08 | \$ 1,597.87 |
| 8/28/08 | \$ 1,197.50 |
| 8/28/08 | \$ 644.92 |
| 8/28/08 | \$ 6,333.64 |
| 8/28/08 | \$ 20,293.08 |
| 8/28/08 | \$ 14,729.04 |
| 8/28/08 | \$ 20,209.43 |
| TOTAL: | \$169,101.45 |

As you know, Commission regulations clearly prohibit such trickery. 11 CFR § 104.3(b)(3)(i) provides as follows:

"Each person to whom an expenditure in an aggregate amount or value in excess of \$200 within the calendar year is made by the reporting committee to meet the committee's operating expenses, together with the date, amount, and purpose of such operating expenditure."

See also 2 U.S.C. § 434(b)(5)(A). As the Commission is well aware, such rules are in place in order to prohibit precisely the obfuscation Illinois Victory 2008 has undertaken here. The rules are more than mere technicalities: they exist to ensure that the public is able to access and analyze the exact recipients of a committee's salary expenditures – not simply so they may learn the name of a committee's human resources paycheck vendor. Particularly in the middle of a contested election, denying the public such information is simply unacceptable.

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Given this clear violation of the law, I respectfully request that the Commission open an investigation in this matter and ensure that Illinois Victory 2008 begins to adhere to the law.


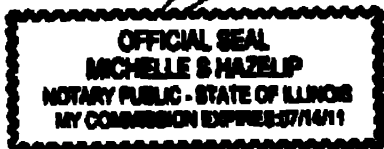
Respectfully yours,



Louis G. Atsaves

Suhscribed and sworn to before me

on this 29th day of September, 2008.


NOTARY PUBLIC

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ATTACHMENT A

DEMOCRAT FOR CONGRESS
DAN SEALS

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Join the Campaign

Sign up here to receive Dan's email newsletter!

EMAIL

 **JOIN**



Volunteer Opportunities for: **Arlington Heights - Arlington Heights Office**



Cook Park Library

Both new and old volunteers are welcome to join us for a volunteer training run by Illinois Victory 2008, the coordinated campaign for Illinois Democrats. We'll go over the basics of phone calls, going door-to-door, writing letters to the editor, and getting out the vote. This will be a great session for people who want to get involved for the first time and a perfect refresher course for current volunteers.

Where:

Libertyville
413 N. Milwaukee Ave
Libertyville, IL 60040 [click for map](#)

Contact: Stacy

Email: info@dansealsforcongress.com
Phone: 847.946.8300

[I Volunteer!](#)

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There are no upcoming events scheduled for this venue

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